

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

In re
Clara L Bowman

Chapter 13
Case No 5:20-bk-01002-MJC

COMMUNITY LOAN SERVICING, LLC FKA
BAYVIEW LOAN SERVICING, LLC
Movant

v

Clara L Bowman
Jack N Zaharopoulos
Respondents

ANSWER OF DEBTOR TO STAY RELIEF MOTION OF MORTGAGEE

Clara L Bowman (the "Debtor"), by Debtor's attorney, Robert Spielman, states the following:

1. Admitted.
2. Admitted.
3. Admitted.
4. Denied. The Debtor is without sufficient information, despite reasonable investigation, to be able to determine the accuracy of the statements concerning the various assignments of the mortgage, or to determine how Community Loan Servicing LLC came to be in the position of legally enforcing the terms of the mortgage, and proof is therefore demanded. The mortgagee listed on the mortgage is MERS, not JP MorganChase Bank, National Association.
5. Admitted.
6. Admitted. In further answer, the arrearage will be cured within a reasonable amount of time. In further answer, the Debtor has suffered financial harm as a result of the Covid pandemic, appears to be entitled to relief under the CARES Act, and has or will apply for assistance from the Movant.
7. Admitted. In further answer, the arrearage will be cured within a reasonable amount of time. In further answer, the Debtor has suffered financial harm as a result of the Covid pandemic, appears to be entitled to relief under the CARES Act, and has or will apply for assistance from the Movant.

8. Denied. The arrearage will be cured within a reasonable amount of time. Further, the Debtor has suffered financial harm as a result of the Covid pandemic, appears to be entitled to relief under the CARES Act, and has or will apply for assistance from the Movant.
9. Admitted.
10. Admitted.

WHEREFORE, the Debtor requests that the Motion be dismissed; and that the Court grant such other relief as is just.

LAW OFFICES OF ROBERT SPIELMAN, P.C.

BY: /s/ Robert Spielman _____

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Bloomsburg, Pennsylvania
Dated: February 8, 2022

CERTIFICATION OF SERVICE

I, Robert Spielman, 29 East Main Street, Bloomsburg, PA 17815-1485 certify: that I am, and at all times hereinafter mentioned was, more than 18 years of age; and that on the date set forth below, I served a copy of the annexed Answer on:

Jack N Zaharopoulos
8125 Adams Dr Ste A
Hummelstown PA 17036

Rebecca A. Solarz, Esquire
KML Law Group, P.C.
701 Market Street, Suite 5000
Philadelphia, PA 19106-1532
Phone: (215) 627-1322 Fax: (215) 627-7734
Attorneys for Movant/Applicant

by first class mail, postage prepaid, addressed as set forth above, or by electronic transmission. I certify under penalty of perjury that the foregoing is true and correct.

LAW OFFICES OF ROBERT SPIELMAN, P.C.

BY: /s/ Robert Spielman

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